COMMITMENT & INTEGRITY
DRIVE RESULTS

41 Hutchins Drive
Portland, Maine 04102
www.woodardcurran.com

T 800.426.4262
T 207.774.2112
F 207.774.6635

WOODARD &CURRAN

June 25, 2010

Becky Blais
Division of Land Resource Regulation
Maine Department of Environmental Protection
17 State House Station
Augusta, Maine 04033-0017

Re: June 21, 2010 Comment Received via Email – Site Location of Development Law and Natural Resources Act Applications on behalf of Calais LNG Project Company, LLC & Calais LNG Pipeline Company, LLC, Calais, Maine.

Dear Ms. Blais:

On behalf of Calais LNG Project Company, LLC and Calais Pipeline Company, LLC ("Calais LNG"), Woodard & Curran (W&C) is providing the attached response to the comment received in an email from you dated June 21, 2010 with the subject line: Coastal wetland minimization.

If you have questions regarding the attached response or you require additional information, please contact me.

Sincerely,

WOODARD & CURRAN INC.

Thomas R. Eschner
Project Director

TRE/gdv
219431.01

Attachments

cc: David Van Slyke, Preti Flaherty
Art Gelber, Calais LNG
File

Response to Comment Received June 21, 2010 from MEDEP Regarding the Calais LNG Project
(Received via email from Becky Blais)

COMMENT: In the minimization statement for coastal wetland impacts, I do not see where this section describes how the length proposed pier or the # of pilings, moorings, dolphins, etc… have been minimized in order to reduce impacts to the coastal wetland.

Therefore, please provide an explanation of how these structures have been minimized (size, # of pilings, # of structures, etc…) to meet the overall needs of the project, while at the same time reducing impacts to the greatest extent practicable.

RESPONSE: The pier and associated dolphins are located to minimize the pier's length while providing the water depth required for the berthing of vessels without dredging, thus minimizing on-going active disturbance of the river bottom. The pier design incorporated the strength of the pier superstructure to minimize the number and size of size of the piles comprising the marine structure, further reducing impacts to intertidal and subtidal areas.

The minimization of impacts from construction of the Pier is also discussed in the SLOD, Section 7.1.2.1.8 (page 20). The second paragraph of that section reads as follows:

"Direct long term impacts to benthic resources are expected to be limited to the footprint of the pilings and mooring dolphins. Minimization of these impacts will be ensured by adherence to BMPs during construction, including using the least intrusive method available for pile installation. In addition, marine construction will be sequenced in a manner that minimizes the need to re-anchor construction vessels or relocate barges, to in turn minimize the disturbance of bottom sediments. "

No specific statement about the minimization of pilings for environmental reasons is made, because the number and placement of pilings is determined by engineering and safety requirements, and little flexibility exists around those parameters. However, while the footprint of the pilings will cause a loss of benthic habitat that will be compensated for as described in Section 4.2.3 of the NRPA Application, the presence of the Pier structure will provide a net gain in more valuable hard surface habitat, as described in Section 4.2.2. of the NRPA Application:

"While structural requirements of the Pier limit available avoidance and minimization strategies, the pilings themselves will provide new colonization space for marine epifauna such as macroalgae, barnacles, limpets, mussels, and other fouling organisms. The potential for greater primary production from algae increases with the amount of available hard substrate. The installation of vertical pilings provides a larger surface area of hard substrate in the intertidal zone, for a distance of approximately 18 ft. Hard substrate provided by the pilings and moorings will also become available subtidally, providing new areas for sessile benthic communities to colonize and provide shade and shelter to species such as lobster, sea urchin, sea cucumber, and finfish and will increase species diversity when compared to the unconsolidated bottom. "

Thus, we believe that the presence of the Pier pilings will not result in adverse effects to marine biota, and may in fact improve habitat characteristics. The number of pilings has been minimized to the extent possible, within the constraints of safety and engineering requirements.